

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DEBORAH M. LUMBARD,)
Plaintiff,) Case No. 05-CV-11124-MEL
v.)
THE PRUDENTIAL INSURANCE COMPANY)
OF AMERICA and)
STATE STREET BANK AND TRUST CO.,)
Defendants.)

JOINT MOTION TO EXTEND TIME
TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT

Pursuant to Fed. R. Civ. P. 6(b), plaintiff Deborah M. Lumbard ("Plaintiff") and defendant State Street Bank & Trust Co. ("Defendant"), by and through their undersigned counsel, respectfully move the Court to extend by twenty (20) days the time in which Defendant may answer or otherwise respond to the Complaint. In support of this motion, the parties state as follow:

1. The deadline for Defendant's responsive pleading is currently June 22, 2005;
2. Defendant needs additional time to investigate and prepare its responsive pleading to the Complaint;
3. Plaintiff assents to this motion; and
4. This Motion is not intended to delay the proceedings in this matter.

WHEREFORE, the parties respectfully request that the Court extend the time in which Defendant may answer or otherwise respond to the Complaint by twenty days, through and including July 12, 2005.

Respectfully submitted,

DEBORAH M. LUMBARD

By her attorney,

James T. Finnigan /dsm

James T. Finnigan
RICH MAY, P.C.
176 Federal Street
Boston, MA 02110
(617) 482-1360

Dated: June 22, 2005

STATE STREET BANK & TRUST CO.

By its attorneys,

Laurie Drew Hubbard

David C. Casey (BBO No. 077260)
Laurie Drew Hubbard (BBO No. 651109)
LITTLER MENDELSON, PC
One International Place, Suite 2700
Boston, MA 02110
(617) 378-6000

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing document was served upon the attorney of record for each other party by first-class mail on June 22, 2005.

Laurie Drew Hubbard

Laurie Drew Hubbard

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